

CIVIL ACTION NO. 5:23-cv-00580-FB

thereto would respectfully show the following:

NATURE OF THE CASE

1. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 1 and on that basis deny the allegations.

2. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 2 and on that basis deny the allegations.

3. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 3 and on that basis deny the allegations.

4. Defendants deny the allegations contained in ¶ 4 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 4 and on that basis deny the allegations.

5. Defendants deny that they supported the conduct alleged in ¶ 5. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 5 and on that basis deny the allegations.

6. Defendants deny the allegations contained in ¶ 6 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 6 and on that basis deny the allegations.

The Medical Doctor Defendants

7-16. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 7-16 and on that basis deny the allegations.

The Fixer Defendants

17. Defendants deny the allegations contained in ¶ 17 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 17 and on that basis deny the allegations

18-26. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 18-26 and on that basis deny the allegations.

27. Defendants deny the allegations contained in ¶ 27.

The Investor Defendants

28-39. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 28-39 and on that basis deny the allegations.

The Labor Trafficking Defendants

40-51. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 40-51 and on that basis deny the allegations.

JURISDICTION AND VENUE

52. Paragraph 52 states a legal conclusion to which no response is required and on that basis Defendants deny the allegations.

53. Paragraph 53 states a legal conclusion to which no response is required and on that basis Defendants deny the allegations.

54. Paragraph 54 states a legal conclusion to which no response is required and on that basis Defendants deny the allegations.

55. Paragraph 55 states a legal conclusion to which no response is required and on that basis Defendants deny the allegations.

56. Paragraph 56 states a legal conclusion to which no response is required and on that basis Defendants deny the allegations.

57. Paragraph 57 states a legal conclusion to which no response is required and on that basis Defendants deny the allegations.

58. Paragraph 58 states a legal conclusion to which no response is required and on that basis Defendants deny the allegations.

PARTIES

Plaintiffs

59. Defendants admit the allegations contained in ¶ 59.

60. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 60 and on that basis deny the allegations.

Defendants

61-80. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 61-80 and on that basis deny the allegations.

81. Defendants admit the allegations contained in ¶ 81.

82. Defendants admit the allegations contained in ¶ 82.

83-91. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 83-91 and on that basis deny the allegations.

Third Parties

92. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 92 and on that basis deny the allegations.

93. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 93 and on that basis deny the allegations.

94. Paragraph 94 does not call for a response.

STATEMENT OF FACTS

Hubbard Meets and Marries Rick

95. Defendants admit that in 2009 Hubbard was in a custody battle over two children from her previous marriage with Shawn Mayer. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 95 and on that basis deny the allegations.

96. Defendants admit that Rick Hubbard and Julia Hubbard were married and had a daughter in or about 2010. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 96 and on that basis deny the allegations.

97-99. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 97-99 and on that basis deny the allegations.

Financial Difficulties Lead Rick to Dr. Eller

100-101. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 100-101 and on that basis deny the allegations.

102. Defendants admit that Hubbard grew up in a conservative Mormon household. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining

allegations contained in ¶ 102 and on that basis deny the allegations.

103-106. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 103-106 and on that basis deny the allegations.

Rick Begins to Pressure Hubbard

107-112. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 107-112 and on that basis deny the allegations.

Rick Meets Eller

113-119. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 113-119 and on that basis deny the allegations.

Rick and Eller Begin to Build the Venture

120-131. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 120-131 and on that basis deny the allegations.

132. Defendants admit that Julia Hubbard obtained custody of her daughter with Rick Hubbard. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 132 and on that basis deny the allegations.

133-136. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 133-136 and on that basis deny the allegations.

The Venture Adds the Medical Doctor Defendants

137-152. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 137-152 and on that basis deny the allegations.

The Fixer Defendants

153-158. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 153-158 and on that basis deny the allegations.

159. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 159 and on that basis deny the allegations. Defendants deny, however, that Shawn Mayer was under investigation for child exploitation.

160. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 160 and on that basis deny the allegations. Defendants deny, however, that Shawn Mayer abused Hubbard.

161. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 161.

162. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 162 and on that basis deny the allegations.

The Investor Defendants

163-165. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 163-165 and on that basis deny the allegations.

Defendant Crow

166-172. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 166-172 and on that basis deny the allegations.

173. Defendants admit that the children attended the Kiddie Campout while Hubbard had custody. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 173 and on that basis deny the allegations.

174-190. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 174-190 and on that basis deny the allegations.

Defendant Brunson

191-195. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 191-195 and on that basis deny the allegations.

Defendant Cain

196-200. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 196-200 and on that basis deny the allegations.

Defendant Cole

201-204. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 201-204 and on that basis deny the allegations.

Defendant Ecob

205-208. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 205-208 and on that basis deny the allegations.

Defendant Juracek

209-212. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 209-212 and on that basis deny the allegations.

Defendant Pendergrass

213-217. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 213-217 and on that basis deny the allegations.

Defendant Pruitt

218-224. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 218-224 and on that basis deny the allegations.

Defendant Rogers

225-228. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 225-228 and on that basis deny the allegations.

Defendants Shawn and Jade Mayer

229. Defendants admit that Shawn Mayer is the former husband of Hubbard. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 229 and on that basis deny the allegations.

230. Defendants deny receiving cash payments from Rick. Defendants deny that the children have attended the Kiddie Campout since Defendants obtained custody of the children from Hubbard. Defendants deny that Rick provided any hotel rooms except for one occasion on which Rick and Goedinghaus came into town to attend a wedding, and Rick requested that Defendants keep two children overnight; Defendants refused to do so in their home out of concerns that allegations might be made against them (since Hubbard had previously made allegations during a custody dispute), so it was agreed that Rick would instead pay for two hotel rooms, one for Defendants and the other for all of the children where they could spend time together and catch up with each other. Defendants deny that Rick told them not to contact Hubbard, except for one time while a custody dispute was pending in court and both Hubbard and Rick told Defendants that it would be better to communicate through Rick rather than directly with Hubbard. Defendants deny the remaining allegations contained in ¶ 230.

231. Defendants deny that Hubbard informed them prior to 2020 that she had been trafficked. Defendants deny the remaining allegations contained in ¶ 231.

232. Defendants deny that they have asked the children to request money from Rick. On one occasion in about July 2019 one of the children on their own requested that Rick help financially with a present that the child wanted to purchase for a sibling. Defendants deny the remaining allegations contained in ¶ 232.

233. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 233 and on that basis deny the allegations.

234. Defendants deny that Rick and Goedinghaus had conversations in Defendants' home, except for one occasion that lasted about 15-20 minutes with one of the children present (and the other children in the next room watching a movie), and the topic of conversation was blueprints and cabinets color options and styles. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 234 and on that basis deny the allegations.

235. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 235 and on that basis deny the allegations.

Rick Escalates the Venture's Activities

236-247. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 236-247 and on that basis deny the allegations.

Hubbard Leaves Rick

248-257. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 248-257 and on that basis deny the allegations.

Hubbard Meets Hynes

258-265. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 258-265 and on that basis deny the allegations.

Hubbard Loses Her Home

266-280. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 266-280 and on that basis deny the allegations.

Plaintiff Goedinghaus Meets Rick

281-286. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 281-286 and on that basis deny the allegations.

The Venture Traffics Goedinghaus

287-303. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 287-303 and on that basis deny the allegations.

Defendant Burlingame

304-309. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 304-309 and on that basis deny the allegations.

The Venture Affected Interstate Commerce

310-315. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 310-315 and on that basis deny the allegations.

SPECIFIC TVPA ALLEGATIONS

Defendant Crow

317-331. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 317-331 and on that basis deny the allegations.

Defendant Eller

332-341. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 342-341 and on that basis deny the allegations.

Defendant Miller

342-346. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 342-346 and on that basis deny the allegations.

Defendant Bolin

347-351. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 347-351 and on that basis deny the allegations.

Defendant Woods

352-357. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 352-357 and on that basis deny the allegations.

Defendant Shah

358-362. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 358-362 and on that basis deny the allegations.

Defendant Cain

363-367. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 363-367 and on that basis deny the allegations.

Defendant Juracek

368-372. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 368-372 and on that basis deny the allegations.

Defendant Ecob

373-377. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 373-377 and on that basis deny the allegations.

Defendant Cole

378-382. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 378-382 and on that basis deny the allegations.

Defendant Mitchell

383-387. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 383-387 and on that basis deny the allegations.

Defendant Knewitz

388-392. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 388-392 and on that basis deny the allegations.

Defendant Pendergrass

393-397. Defendants lack knowledge or information sufficient to form a belief about the

truth of the allegations contained in ¶ 393-397 and on that basis deny the allegations.

Defendant Rogers

398-402. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 398-402 and on that basis deny the allegations.

Defendant Pruitt

403-407. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 403-407 and on that basis deny the allegations.

Defendant Brunson

408-412. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 408-412 and on that basis deny the allegations.

RICO Predicate Acts

413. Defendants deny the allegations contained in ¶ 413 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 413 and on that basis deny the allegations.

414. Defendants deny the allegations contained in ¶ 414 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 414 and on that basis deny the allegations.

415. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 415 and on that basis deny the allegations.

416. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 416 and on that basis deny the allegations.

417. Defendants deny the allegations contained in ¶ 417 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 417 and on that basis deny the allegations.

418. Defendants deny the allegations contained in ¶ 418 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 418 and on that basis deny the allegations.

419. Defendants deny the allegations contained in ¶ 419 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 419 and on that basis deny the allegations.

420. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 420 and on that basis deny the allegations.

421. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations contained in ¶ 421 and on that basis deny the allegations.

CAUSES OF ACTION

Count One: Human Trafficking Laws: Sex Trafficking

422. Paragraph 422 does not call for a response.

423. Defendants deny the allegations contained in ¶ 423 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 423 and on that basis deny the allegations.

424. Defendants deny the allegations contained in ¶ 424 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 424 and on that basis deny the allegations.

425. Defendants deny the allegations contained in ¶ 425 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 425 and on that basis deny the allegations.

Count Two: Human Trafficking Laws: Labor Trafficking

426. Paragraph 426 does not call for a response.

427. Defendants deny the allegations contained in ¶ 427 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 427 and on that basis deny the allegations.

428. Defendants deny the allegations contained in ¶ 428 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 428 and on that basis deny the allegations.

429. Defendants deny the allegations contained in ¶ 429 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 429 and on that basis deny the allegations.

Count Three: RICO: Pattern of Racketeering

430. Paragraph 430 does not call for a response.

431. Defendants deny the allegations contained in ¶ 431 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 431 and on that basis deny the allegations.

432. Defendants admit the allegations contained in ¶ 432.

433. Defendants deny the allegations contained in ¶ 433 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth

of the remaining allegations contained in ¶ 433 and on that basis deny the allegations.

434. Defendants deny the allegations contained in ¶ 434 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 434 and on that basis deny the allegations.

435. Defendants deny the allegations contained in ¶ 435 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 435 and on that basis deny the allegations.

436. Defendants deny the allegations contained in ¶ 436 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 436 and on that basis deny the allegations.

437. Defendants deny the allegations contained in ¶ 437 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 437 and on that basis deny the allegations.

438. Defendants deny the allegations contained in ¶ 438 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 438 and on that basis deny the allegations.

439. Defendants deny the allegations contained in ¶ 439 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 439 and on that basis deny the allegations.

Count Four: RICO: RICO Conspiracy

440. Paragraph 440 does not call for a response.

441. Defendants deny the allegations contained in ¶ 441 to the extent the allegations

pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 441 and on that basis deny the allegations.

442. Defendants admit the allegations contained in ¶ 442.

443. Defendants deny the allegations contained in ¶ 443 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 443 and on that basis deny the allegations.

444. Defendants deny the allegations contained in ¶ 444 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 444 and on that basis deny the allegations.

445. Defendants deny the allegations contained in ¶ 445 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 445 and on that basis deny the allegations.

446. Defendants deny the allegations contained in ¶ 446 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 446 and on that basis deny the allegations.

447. Defendants deny the allegations contained in ¶ 447 to the extent the allegations pertain to them. Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations contained in ¶ 447 and on that basis deny the allegations.

AFFIRMATIVE DEFENSES

First Affirmative Defense: Statute of Limitations

448. Some or all of Plaintiffs' claims are barred by the applicable statute of limitations, including, but not limited to, the four-year statute of limitations applicable to Civil RICO claims.

Second Affirmative Defense: Divorce Obligations

449. Some or all of the payments and other benefits received by Defendants were in the discharge of Plaintiff Hubbard's obligation to pay child support and/or were incidental to costs incurred in visitation and/or were for the benefit of the children of Plaintiff Hubbard and Defendant Shawn Mayer.

Third Affirmative Defense: Res Judicata and Collateral Estoppel

450. Plaintiffs' claims are barred, in whole or in part, by res judicata and/or collateral estoppel based on prior litigation between Plaintiff Hubbard and Defendant Shawn Mayer.

Fourth Affirmative Defense: Contributory or Comparative Fault

451. Plaintiffs' damages, if any, were caused, in whole or in part, by acts or omissions of Plaintiffs or third parties over whom Defendants had no control and for which they are not legally responsible. Plaintiffs' recovery, if any, should be barred or proportionately reduced by Plaintiffs' and third parties' fault or degree of responsibility.

Fifth Affirmative Defense: Offset or Credit

452. Defendants are entitled to an offset or credit for any amounts Plaintiffs recover from any other person for such loss, injury or damages at trial, through settlement, or otherwise.

Sixth Affirmative Defense: Damages Too Speculative and Remote

453. Plaintiffs' claims are barred, in whole or in part, because the damages Plaintiffs seek are too speculative and remote and because of the impossibility of the ascertainment and allocation of such alleged damages.

Seventh Affirmative Defense: Avoidable Consequences And/or Failure to Mitigate

454. Plaintiffs' claims are barred, in whole or in part, or, at a minimum, recovery should be reduced pursuant to the doctrines of avoidable consequences and/or failure to mitigate. To the extent Plaintiffs may have suffered any damages, they were required to take reasonable and timely actions to limit their losses which they failed to do.

Eighth Affirmative Defense: in Pari Delicto

455. Plaintiffs' claims are barred in whole or in part by the doctrine of in pari delicto because, to the extent any of the alleged conduct occurred, Plaintiffs were knowing and active participants in it and received benefits therefrom. Application of the doctrine here does not interfere with the policy goals of the relevant federal statutes.

PRAYER

WHEREFORE, Defendants Shawn Mayer and Jade Mayer request judgment:

- (A) that Plaintiffs take nothing by their suit;
- (B) that Plaintiffs' claims be denied in their entirety as to Defendants Shawn Mayer and Jade Mayer;
- (C) that Plaintiffs be awarded their costs of court incurred in this suit; and
- (D) that the Court grant Defendants Shawn Mayer and Jade Mayer such other, further, and general relief to which they may show themselves to be justly entitled.

Date: January 22, 2024

Respectfully submitted,

/s/ Kurt S. Elieson

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CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2024 a true and correct copy of the foregoing document has been served on all counsel of record via CM/ECF at the time of filing.

/s/ Kurt S. Elieson

Kurt S. Elieson